

TITLE V COMPLIANCE TRAINING

WORKSHOP MANUAL

**Stationary Source Program
Air Quality Division
Idaho Department of Environmental Quality
May 2003**

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CASE STUDY

- Semiannual Report

INSTRUCTIONS FOR TIER I SEMIANNUAL REPORT

FORM AQ-C4

In accordance with IDAPA 58.01.01.322.08.b and c, compliance with Tier I operating permits requires submittal of a Semiannual Report. The permittee may comply with these requirements by submitting completed copies of this Semiannual Report (Form AQ-C4), the Semiannual Monitoring Table (Form AQ-C5), and the Semiannual Deviation Summary Table (Form AQ-C3), to the Department. As the Annual Compliance Certification (Form AC-C1) and the Annual Compliance Certification Table (Form AQ-C2) incorporate the reporting requirements of the Semiannual Report (in accordance with IDAPA 58.01.01.322.08), a separate submittal of a Semiannual Report (Form AQ-C4) is not required when the Annual Compliance Certification is due.

Facility Information:

Enter the facility-specific information as indicated at the top of the form.

Permit and Compliance Information:

Tier I Operating Permit No. and Issuance Date:

Enter the permit no. and issuance date as it appears on the issued Tier I operating permit. If there was another Tier I operating permit in effect during the reporting period (a permit could have been modified during the reporting period), insert the additional permit information on the second line. Add more lines as needed.

Compliance Reporting Period:

Enter the time period which is addressed by this Semiannual Report (e.g., January 10, 2003 to July 9, 2003).

Deviations reported this period:

Check either yes or no to indicate if any deviations from permit conditions are being reported for the given reporting period. If the answer is yes, then attach the Semiannual Deviation Summary Table (Form AQ-C3) to this Semiannual Report.

List of Attachments:

Check the box for each attachment included with this certification. If additional information has been included to supplement the required Tables, please check the "Other" box. Include a title for each attachment provided and indicate the number of pages each attachment contains.

Responsible Official Certification:

The responsible official must sign a certification of truth, accuracy, and completeness for a Semiannual Report. Without this certification, the Semiannual Report does not meet the requirements of IDAPA 58.01.01.123, 322.08.c or 322.15.q. Note that the Co-Permittee Responsible Official signature applies only to the U.S. Department of Energy (INEEL).

A responsible official can be any of the following:

- For a corporation: the president, secretary, treasurer, or vice-president.
- For a partnership or sole proprietorship: the general partner or the proprietor.
- For a municipality, state, federal, or other public agency: the principal executive officer or ranking elected official.

[IDAPA 58.01.01.006.86]

Please note that:

1. No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under any permit or any applicable rule or order in force pursuant thereto.
[IDAPA 58.01.01.125]
2. No person shall knowingly render inaccurate any monitoring device or method required under any permit, or any applicable rule or order pursuant thereto.
[IDAPA 58.01.01.126]

Mailing Instructions:

Submit the completed Semiannual Report to the DEQ Regional Office listed in the facility-wide section of your Tier I Operating Permit. Be sure to also include copies of the Tables and all attachments.



SEMIANNUAL MONITORING TABLE

FORM AQ-C5

Facility Name:	<u>Bogus Widget Company</u>	Permit No.:	<u>T1-123456</u>
Facility Location:	<u>1234 Country Road, Tealeaf, Idaho</u>	Issuance Date:	<u>6-8-02</u>
Facility ID (AIRS No.):	<u>123-00045</u>	Compliance Reporting Period:	<u>6-8-02 through 12-7-02</u>

1 Permit Condition	2 Condition Title / Description	3 Comments
SECTION 2: FACILITY-WIDE CONDITIONS		
2.2	Monitor and record frequency of methods used for reasonable control of fugitive dust	Dirt roads watered weekly. Log maintained at facility; available upon request.
2.3	Maintain records of all fugitive dust complaints received	No complaints this period. Log maintained at facility; available upon request.
2.4	Monthly facility-wide inspections of potential sources of fugitive emissions	Inspections conducted monthly. No fugitive emissions problems noted. Log maintained at facility; available upon request.
2.6	Maintain records of all odor complaints received	No complaints this period. Log maintained at facility; available upon request.
2.8	Monthly facility-wide inspections of potential sources of visible emissions	Inspections conducted monthly. No VE problems noted. Log maintained at facility; available upon request.
2.10.1	Maintain documentation of supplier verification of distillate fuel oil content on an as-received basis	Records maintained at facility; available upon request.
2.15	Notify DEQ of intent to test 15 days prior to test; test in accordance with IDAPA 58.01.01.157; submit protocol 30 days in advance; submit test report 30 days after test	This condition was met for the Boiler No. 1 test conducted on 6/15/02
2.17	Maintain sufficient records to assure compliance with all terms and conditions in the Tier I permit	Records maintained at the facility; available upon request
SECTION 3: BOILER NO. 1 (WB1)		
3.5	Performance tests for Boiler No. 1, within one year of issuance of Tier II operating permit No. 123-00045, dated March 11, 2002, to demonstrate compliance with the emission limits for PM ₁₀ and CO in Permit Condition 3.1 and for the PM emissions limit in Permit Condition 3.3	Performance tests conducted on 6/15/02. Submitted to DEQ on 7/15/02. Approved by DEQ on 9/10/02. Test report maintained at facility; available upon request.
3.6	Fuel firing rate monitoring requirements (continuous fuel-firing rate monitoring, record fuel-type fired each time the fuel type is changed, record the average daily firing rate, record the gas-firing rate for each consecutive 12-month period)	Firing rate monitoring was performed as required. Records maintained at facility; available upon request. An exceedance of the allowable fuel oil firing rate in Permit Condition 3.4 (120% of source test) occurred from 8/11/02 through 8/15/02 - see deviation report.
3.7	Compliance with Permit Condition 2.8	Inspections conducted monthly. No VE problems noted. Log maintained at facility; available upon request.
SECTION 4: DRYER NO. 1 (WD1)		
4.5	Inspect Dryer No. 1 scrubber at least once per year	Dryer No. 1 scrubber was inspected on 10/16/02 in per permit condition 4.6
4.6	Performance tests shall be conducted on Dryer No. 1, within one year of issuance of the Tier I permit, to demonstrate compliance with the emission limits for PM ₁₀ in Permit Condition 4.1 and for the PM emissions limit in Permit Condition 4.2	Performance tests scheduled for April, 2003
4.7	Dryer No. 1 input monitoring / recordkeeping requirements. (Continuous input monitoring, calculate / record the average hourly input, calculate / record the average monthly input in T/mo, record annual input on a 12-month rolling basis)	Input rate within limits of Permit Condition 4.3 (50 T/hr and 438,000 T/yr). Records maintained at facility; available upon request.



SEMIANNUAL MONITORING TABLE

FORM AQ-C5

1 Permit Condition	2 Condition Title / Description	3 Comments
4.8	Scrubber monitoring / recording requirements (continuous flow rate and pressure drop monitoring; recorded weekly)	Scrubber water flow rate and pressure drop maintained within parameters of Permit Condition 4.4. Records maintained at facility; available upon request.
4.9	Concentration of TDS in the recirculated scrubber water shall be analyzed and recorded monthly	TDS concentration within parameters of Permit Condition 4.4. Records of TDS analyses maintained at facility; available upon request.
SECTION 5: MATERIAL HANDLING PROCESS (WT1)		
5.6	Inspect Baghouse No. 1 at least once per year	The annual inspection was not performed during this semiannual reporting period
5.7	Throughput monitoring / recording requirements (monitor and record daily amount of widgets transferred to final storage bin, calculate and record the average monthly amount of widgets transferred to final storage bin, record annual amount transferred to final bin on a 12-month rolling basis).	Throughput exceeded limits of Permit Condition 5.5 on three separate occasions – see deviation report. Throughput records maintained at facility; available upon request.

INSTRUCTIONS FOR SEMIANNUAL MONITORING TABLE

FORM AQ-C5

Column 1: Permit Condition Number

Enter the number of each permit condition or term that addresses monitoring, exactly as it appears in the Tier I permit.

Column 2: Permit Condition Title or Description

Enter the permit condition title or a brief summary to describe the requirement(s) of the permit condition.

Column 3: Comments

Describe the monitoring that was conducted during the reporting period.

- Monitoring includes any condition determined by observation, by data from any monitoring protocol, or by any other monitoring which is required by the permit as well as the record keeping associated with that monitoring. For example, this would include fuel use or process rate monitoring, fuel analyses, operational or control device parameter monitoring (e.g., pressure drop), hours of operation, etc.
- Monitoring includes conditions for testing and the recordkeeping associated with that testing.
- Information may also be provided for any other material information which will be used to determine compliance status in the Annual Compliance Certification (i.e., information beyond monitoring which is specifically required which may potentially affect compliance status).
- Note that each instance where monitoring was not performed as specified in the permit is a deviation. This must be entered into the Semiannual Deviation Summary Table (Form AQ-C3) if not previously reported.
- In Column 3, also provide a brief description of each deviation that occurred during this semiannual reporting period and how it impacted the monitoring condition in Column 1. This includes deviations reported on the Deviation Summary Table (Form AQ-C3) as well as other deviations that were reported promptly at an earlier date (e.g., excess emissions events, NSPS report per 40 CFR 60.7(c), etc.).



TIER I SEMIANNUAL DEVIATION SUMMARY TABLE

FORM AQ-C3

Facility Name: <u>Bogus Widget Company</u>	Permit No.: <u>T1-123456</u>
Facility Location: <u>1234 Country Road, Tealeaf, Idaho</u>	Issuance Date: <u>6-8-02</u>
Facility ID (AIRS No.): <u>123-00045</u>	Compliance Reporting Period: <u>6-8-02 through 12-7-02</u>

1 No.	2 Permit Condition	3 Emissions Unit	4 Deviation	5 Time Began		6 Time Ended		7 Date DEQ Notified	8 Cause	9 Corrective Action & Preventative Measures	10 Attachment
				Date	Hour	Date	Hour				
1	3.4	Boiler No.1	Fuel-firing limit for No. 1 fuel oil	8/11/2002	9:00 AM	8/15/2002	3:00 PM	this report	Exceeded capacity of boiler by 100 gal/hr	Installation of feed-back loop controls to prevent future exceedences	A
2	5.5	Material Handling Process	Exceeded throughput limits	10/5/2002	8:45 AM	10/6/2002	5:05 PM	this report	Operator Oversight	Talked to operators	B
3	5.5	Material Handling Process	Exceeded throughput limits	10/12/2002	10:45 AM	10/15/2002	1:05 PM	this report	Operator Oversight	Talked to operators	B
4	5.5	Material Handling Process	Exceeded throughput limits	10/28/2002	9:10 AM	11/2/2002	3:05 PM	this report	Operator Oversight	Talked to operators	B

INSTRUCTIONS FOR TIER I DEVIATION SUMMARY TABLE

FORM AQ-C3

The purpose of the Semiannual Deviation Summary Table (Form AQ-C3) is to provide information required by IDAPA 58.01.01.322.08. Each and every permit condition is subject to prompt deviation reporting. Deviation reports are due at least every six months unless the permit specifies another time frame. All instances of deviations from permit requirements must be clearly identified in the report. Deviations attributable to excess emissions must be reported in accordance with IDAPA 58.01.01.130-136 and, therefore, are not required to be addressed on this form.

Column 1: No.

Each deviation is assigned a number for tracking purposes.

Column 2: Permit Condition Number

Enter the number of the permit condition for which the deviation occurred exactly as it appears in the applicable permit.

Column 3: Emissions Unit(s)

Enter the name of the emissions unit(s) for which the deviation occurred. If the deviation applied to the entire facility, enter "facility-wide."

Column 4: Deviation

Enter a description of the deviation and quantify it where practical (e.g., the actual fuel oil firing rate was 12 gal/hr). All instances of deviations from the Tier I operating permit requirements must be clearly identified. Deviation means any situation in which an emissions unit fails to meet a permit term or condition. A deviation is not always a violation. A deviation can be determined by observation or through review of data obtained from any testing, monitoring, or recordkeeping established in the Tier I operating permit. For a situation lasting more than 24 hours which constitutes a deviation, each 24-hour period is considered a separate deviation. Included in the meaning of deviation are any of the following:

- (1) A situation where emissions exceed an emissions limitation or standard .
- (2) A situation where process or emissions control device parameter values indicate that an emissions limitation or standard has not been met.
- (3) A situation in which observations or data collected demonstrates noncompliance with an emissions limitation or standard or any work practice or operating condition required by the permit.
- (4) A situation where required monitoring, recordkeeping, and/or reporting are not done, or the frequency specified in the permit is not met.
- (5) A situation in which an exceedance or an excursion occurs, as defined in 40 CFR 64, *Compliance Assurance Monitoring* (CAM Rule).
(This only applies if the emissions unit is subject to CAM.)

Columns 5 and 6: Time Began and Time Ended

Enter the date and time when the deviation began and when it ended.

Column 7: Date DEQ Notified

Enter the date DEQ was notified of the deviation. Enter the actual date reported if the deviation is subject to an applicable requirement which defines the term "prompt" or otherwise specifies a time frame for reporting deviations. For other deviations not previously reported, the date may be entered as "This Report."

Column 8: Cause

Enter the cause or causes of the deviation.

Column 9: Corrective Actions and/or Preventive Measures

Identify any corrective actions and/or preventative measures taken to correct the deviation and/or prevent a recurrence. If the deviation concerns a monitoring requirement in the permit, describe any alternative monitoring conducted or other credible evidence that is available to determine compliance. The term credible evidence means any reliable evidence beyond that generated from required monitoring that could be used to determine compliance.

Column 10: Attachment

Indicate if additional information is attached to aid the compliance determination. If multiple attachments are included, label each attachment as it applies to the respective permit condition. In Column 10 of Form AQ-C3, provide an identifier (A, 1, or similar) that clearly links the attachment to the permit condition. The attachment should also contain the unique identifier and the name or label of the attachment as it applies to the permit condition. Clearly indicate how the attachment applies to Columns 4, 5, 6, 7, and 9 of Form AQ-C3.

Attachment A

1. From 8/11/02 through 8/15/02, the No. 1 fuel oil-firing rate was 2000 gal/hr which slightly exceeded the limit established in Permit Condition 3.4 by 100 gal/hr. The boiler was running at maximum capacity, with respect to steam-generation, and the excess firing rate was not noted until 8/20/02. This event may have resulted in an exceedence of the PM-10 and/or CO emissions limits in Permit Condition 3.1.

Prior to this event, Bogus Widget Co. was not aware that the boiler could exceed the fuel-firing rate limit in condition 3.4. Since the event, Bogus Widget Co. has installed (9/1/02) a valve and feed-back loop monitoring system that will prevent any future exceedences.

Attachment B

1. The average hourly throughput of widgets exceeded the permitted limit in Permit Condition 5.5 several times through the months of October and November. Records are available upon request. Bogus Widget Co. maintains that the baghouse would have controlled emissions associated with the throughput exceedances, so the emissions limit in Permit Condition 5.1 would not have been exceeded.